



U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION II

Emergency and Remedial Response Division
290 Broadway, 20th floor
New York, NY 10007-1866

VIA Email

November 9, 2018

Todd Cridge
Arcadis, US, Inc.
One Lincoln Center
110 W Fayette, Ste 300
Syracuse, NY 13202

Dear Todd,

The US Environmental Protection Agency (EPA) and the New York State Department of Environmental Conservation (DEC) have reviewed your October 19, 2018 response to EPA's September 7, 2018 letter. We have the following comments:

1. Accepted.
2. Accepted. It would be helpful if you could highlight some of the elevations within the sampling area. There are very few elevation numbers on the topographic lines.
3. Accepted.
4. Accepted.
5. Accepted.
6. Accepted.
7. The precision of the Remedial Investigation delineation was fairly crude, and the purpose of the Remedial Design is to tighten up the excavation contours. It shouldn't make any difference if the contaminants are PCBs or metals. Please add a couple of samples within Soil- F so that we can be sure that "clean" is defined laterally and by depth.
8. Accepted.
9. Accepted.
10. See the response to #7 above.
11. Accepted.
12. Ley Creek has a long history of flooding and contaminated floodplains exist upstream. While it is unfortunate that the area in question was not sampled during the Remedial Investigation, it still represents a data gap for this site that EPA and DEC would like to close. A review of the topographic maps show several flat areas between the slope leading

to the rail lines and the creek that should be sampled. Arcadis assumes that this area is not contaminated but there is no data to confirm that assumption. We also do not wish this sampling effort to delay the completion of the PDI. Therefore, please schedule this sampling effort for later in the design phase. If you wish to discuss this further, please let me know and I will set up a conference call.

Please let me know if you have any questions and/or comments regarding the above. Also, I would appreciate receiving your field sampling schedule for this work.

Sincerely,

A handwritten signature in black ink, appearing to read "Pam Tames". The signature is fluid and cursive, with the first name "Pam" and last name "Tames" clearly distinguishable.

Pamela Tames, P.E.

Remedial Project Manager

Cc: Jacky Luo, NYSDEC

Don Hesler, NYSDEC

Alma Lowry, Onondaga Nation